

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Adrian P. Conway	:	Chapter 7
Sharon E. Conway	:	Case No.: 19-15968-ELF
Debtor(s)	:	

MOTION TO AVOID LIEN
OF PENNSYLVANIA DEPARTMENT OF LABOR AND INDUSTRY

Debtors, Adrian and Sharon Conway, by and through attorney Brad J. Sadek, respectfully move this Honorable Court for an order avoiding the judicial lien of Pennsylvania Department of Labor & Industry, filed in the Delaware County Court of Common Pleas and in support thereof allege the following:

1. Debtors filed the above captioned Chapter 7 Petition on September 24, 2019.
2. On January 2, 2020, an Order was entered Discharging the Chapter 7 case.
3. Pennsylvania Department of Labor & Industry holds a judicial lien in the amount of \$2,909.99 against the debtors' property located at 276 Childs Avenue Drexel Hill 19026. The judgment was entered in the Delaware County Court of Common Pleas under Case No. CV-2019-063150 on May 23, 2019.
4. This lien was not avoided at the time of initial filing.
5. The debtors' real estate fair market value is estimated at \$146,400.00. See Exhibit "A."
6. The balance on the mortgage owed to Mr. Cooper is estimated to be \$139,223.00.
7. The exemptions in the debtors' assets do not exceed the limits provided under 11 U.S.C. 522(D)(1).

8. As a result, the aforesaid lien impairs the debtors' exemptions allowed under the Code and is avoidable pursuant to 11 U.S.C. 522(f).

WHEREFORE, Debtors, by and through the undersigned counsel, respectfully request this Honorable Court enter an Order avoiding the judicial lien of Pennsylvania Department of Labor & Industry in the amount of \$2,909.99.

/s/ BRAD J. SADEK, ESQ.

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Dated: April 7, 2022